

eliminating the active safety function, and maintaining a passive safety function. The postulated accidents which require the Primary Containment to act as a barrier in order to mitigate the release of radioactivity described in the LGS Updated Final Safety Analysis Review [Report] (UFSAR) Section 15, are not affected by these changes. Therefore, the previously evaluated postulated on-site and off-site radiological effects of these accidents will not change.

The DCWS valves will be prohibited from opening during OPCONs 1, 2, and 3 by physical changes made to the electrical control circuitry and administrative controls. Therefore, the probability of the valves to fail in the open position will diminish, and the required Primary Containment isolation safety function will be maintained.

Therefore, these proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes remove the affected automatic isolation relays from the DCWS MOVs' circuitry. These changes eliminate any postulated relay failure effects on the associated control circuits and electrical power supplies. The proposed changes do not introduce any new accident initiators or any new valve failure modes not previously evaluated.

Therefore, these changes will not create the possibility of a new or different kind of accident from any accidents previously evaluated.

3. The proposed TS changes do not involve a significant reduction in a margin of safety.

The proposed changes will prohibit the opening of the DCWS valves which provide backup cooling from RECW [reactor enclosure cooling water] during OPCONs 1, 2, and 3. The RECW System is not the normal DCWS cooling alignment, is not required as a backup safety related drywell cooling system, and this backup alignment is not an automatic function. The proposed changes do not affect the function or operation of DCWS, and since the proposed changes and administrative controls ensure the valves will remain closed during OPCONs 1, 2, and 3, the capability for Primary Containment isolation is not affected. Therefore, the changes will not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

*Local Public Document Room location:* Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464.

*Attorney for licensee:* J. W. Durham, Sr., Esquire, Sr. V.P. and General Counsel, Philadelphia Electric

Company, 2301 Market Street, Philadelphia, Pennsylvania 19101.

*NRC Project Director:* John F. Stolz.

*Philadelphia Electric Company, Docket Nos. 50-352 and 50-353, Limerick Generating Station, Units 1 and 2, Montgomery County, Pennsylvania*

*Date of amendment request:* February 22, 1995.

*Description of amendment request:* The proposed change to Limerick Generating Station (LGS) Units 1 and 2 Technical Specifications (TS) revises various TS Surveillance Requirements to clarify the Emergency Diesel Generator acceptable steady state voltage range.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed Technical Specifications changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed Emergency Diesel Generator steady state voltage range of 4280 [plus or minus] 120 volts provides voltages through the 4160V and 480V distribution systems which are within the operating range of the connected equipment and power system components. Therefore, the reduced steady state voltage range will not cause the malfunction of any equipment or affect the operation of any equipment in a manner which would increase the probability of occurrence of an accident previously evaluated in the [Safety Analysis Report] SAR.

Reducing the Emergency Diesel Generator steady state voltage range in the Technical Specifications maintains the capability of the Emergency Diesel Generator to start and attain rated voltage and frequency within 10 seconds and to accept the engineered safeguard loads in the required time in order to mitigate the consequences of an accident. The Emergency Diesel Generator automatic voltage regulator setting is calibrated to within a range of 4266.5 volts to 4308.5 volts. A review of results from recent monthly Emergency Diesel Generator Surveillance Tests has confirmed that the voltage regulators currently maintain the Emergency Diesel Generator steady state voltage within the 4280 [plus or minus] 120 volt range to be included in the Technical Specifications. Establishing, via Technical Specification surveillance requirements and administrative limits within Station Surveillance Test Procedures, that the Emergency Diesel Generator voltage regulator is maintaining the steady state voltage within a narrower range (within the existing range) provides increased assurance that connected equipment required to mitigate the consequences of an accident will operate as required.

Therefore, the proposed TS changes do not involve an increase in the probability or

consequences of an accident previously evaluated.

2. The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Reducing the Emergency Diesel Generator steady state voltage range in the Technical Specifications to a range of 4280 [plus or minus] 120 volts does not create any new accident initiators or affect any existing accident initiators such that a different type of accident than previously evaluated could result. The function and operation of the Emergency Diesel Generators and their connected loads are not changed in a manner which would create the possibility of an accident of a different type than any previously evaluated.

Therefore, the proposed TS changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed TS changes do not involve a significant reduction in a margin of safety.

Reducing the Emergency Diesel Generator steady state voltage range in the Technical Specifications to a range of 4280 [plus or minus] 120 volts does not reduce the margin of safety. The reduced range provides increased assurance that the equipment powered by the Emergency Diesel Generators will start and operate as designed in order to perform their design basis functions.

Therefore, the proposed TS changes do not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*Attorney for licensee:* J. W. Durham, Sr., Esquire, Sr. V.P. and General Counsel, Philadelphia Electric Company, 2301 Market Street, Philadelphia, Pennsylvania 19101.

*NRC Project Director:* John F. Stolz.

*Philadelphia Electric Company, Docket Nos. 50-352 and 50-353, Limerick Generating Station, Units 1 and 2, Montgomery County, Pennsylvania*

*Date of amendment request:* March 1, 1995.

*Description of amendment request:* The proposed changes will clarify the concentrations of calibration gas required to calibrate the Hydrogen and Oxygen Analyzers, and support the requirements of Limerick Generating Station (LGS) Transient Response Implementation Plant (TRIP) T-102, "Primary Containment Control Bases."

*Basis for proposed no significant hazards consideration determination:*